



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

DATE: APR 26 2016

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
McWane Ductile, Coshocton, Ohio

FROM: Patrick Miller, Environmental Engineer
AECAB (MN/OH)

THRU: Brian Dickens, Section Chief
AECAB (MN/OH)

TO: File

BASIC INFORMATION

Facility Name: McWane Ductile (McWane)

Facility Location: 2266 South Sixth Street, Coshocton, Ohio 43812

Date of Inspection: November 17, 2015 and November 19, 2015

Lead Inspector: Patrick Miller, Environmental Engineer, U.S. EPA

Other Attendees:

1. David Sutlin, Environmental Engineer, U.S. EPA
2. Tom Kistler, Environmental Specialist, McWane
3. Eric Squire, Assistant Environmental Manager, McWane
4. Heather Rainwater, Environmental Manager, McWane

Purpose of Inspection: Foundry inspection

Facility Type: Ductile iron foundry

November 17, 2015

Arrival Time: 3:30 PM

Departure Time: 4:00 PM

November 19, 2015

Arrival Time: 9:20 AM

Departure Time: 11:20 AM

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Mr. Tom Kistler, Mr. Eric Squire, and Ms. Heather Rainwater unless otherwise noted. On November 17, 2015, at approximately 2:40 PM, Mr. Sutlin and Mr. Miller of the U.S. EPA were driving past the facility when the cupola furnace cap was observed open and emitting visible emissions and steam. EPA arrived at the facility at 3:30 PM and asked to speak to the environmental manager. EPA met Mr. Kistler, who indicated that the cupola furnace was shutting down for the day and that the furnace cap opening is part of the shutdown process. Mr. Kistler wasn't familiar with the exact furnace shutdown procedure but indicated that he only started working at the facility in mid-July 2015. Ms. Rainwater, the environmental manager, was out of the office at the time. On November 19, 2015, EPA returned to inspect the facility when Ms. Rainwater and Mr. Squire were present.

Company Ownership: Ownership of the facility has not changed, however in spring of 2015, the facility changed its name from Clow Water Systems to McWane Ductile, in line with its parent company and owner. Clow Water Systems was purchased by McWane Ductile in the 1990's.

Process Description:

The facility produces ductile iron pipe used in pressurized municipal water distribution systems. The pipe is 18 feet long and ranges from 6 to 36 inches in diameter. The facility can also produce utility pole sections which are typically 18 feet long and 30 inches in diameter. The pole lengths are shipped across the street to the McWane Pole facility for finishing.

The facility produces iron in a cupola furnace rated at 85 tons per hour. The emissions from the furnace are controlled by an afterburner and a wet scrubber. There is also a "wet cap" on the furnace that helps remove some particulate matter from the exhaust stream before the scrubber. The water from the "wet cap" is captured in a trough system and treated at the waste water treatment system on-site. The facility is considered a large foundry under the Area Source NESHAP Subpart ZZZZZ for Iron and Steel Foundries.

When the furnace shuts down, it is charged with coke and drained of molten iron, while continually reducing blast air. After the furnace is empty of molten iron and the blast air has been cut off, the pollution control equipment runs for 15-30 minutes before the furnace cap is opened. The coke then continues to smolder in the bottom of the furnace but no iron reduction reaction is taking place. The furnace cap remains open until the furnace is ready to restart.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:



Figure 1 Cupola Furnace in background with furnace cap open

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

Ms. Rainwater indicated that photos taken on site during the inspection on November 19, 2015, are confidential business information. Sixteen digital photos were taken and copies were left with Ms. Rainwater.


Requested documents:

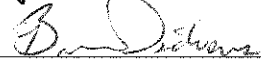
- SDS sheets on HAP containing coatings
- Performance stack test on the cupola furnace conducted May 2015
- Last performance stack test on the cupola furnace for all pollutants listed in permit

- Records from 10/1/2015 – 11/19/2015 for the daily checks related to pressure differential, flow, and temperature of afterburner as well as the visible emission checks of the furnace shroud and stack

Concerns: EPA indicated that the visible emissions from the furnace when the cap is open are a concern given that it is regularly performed after each day of production. Ms. Rainwater explained that McWane follows a plan and takes a sequence of steps in order to reduce emissions during shutdown.

SIGNATURES

Lead Inspector:  Date: 4/26/16

Section Chief:  Date: 4/26/16

Facility Name: McWane Ductile

Facility Location: 2266 South Sixth Street Coshocton, Ohio 43812

Date of Inspection: November 19, 2015

APPENDICES AND ATTACHMENTS

- Attachment A – Photo Log (CBI)

Contains Items Claimed as CBI – Non-Releasable

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CONFIDENTIAL BUSINESS INFORMATION ATTACHMENT

Attachment A – Photo Log (compact disc)

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Date of Inspection: November 19, 2015

APPENDIX A: FIELD NOTES AND FIELD MEASUREMENT DATA

